

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LISA COOLEY, LLC

Plaintiff,

V.

THE NATIVE, S.A.

Defendant.

No. 20-cv-5800 (VEC)

**NOTICE OF MOTION TO
DISMISS**

Oral Argument Requested

PLEASE TAKE NOTICE that upon the annexed declaration of Christian Eich, executed on December 17, 2020, with the exhibits attached thereto, the declaration of Serge Umansky, executed December 17, 2020, the declaration of Victor Lezuitov, executed on December 21, 2020, the declaration of Jesenia Ruiz de la Torre, executed on December 21, 2020, with the exhibits attached thereto, and the accompanying memorandum of law, Defendant The Native, S.A. appears specially for the limited purpose of challenging personal jurisdiction and service of process to move this Court, located at 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an order pursuant to Rule 12(b)(2) and (5) of the Federal Rules of Civil Procedure, dismissing the complaint against the Defendant in this action for lack of personal jurisdiction and insufficient service of process.

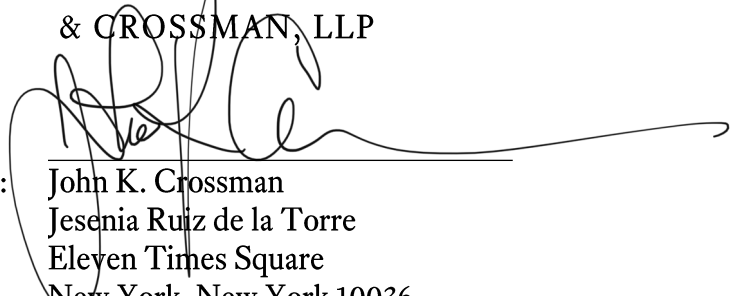
In accordance with the Court's December 11, 2020 Order, any opposing papers shall be served on or before January 11, 2021, and any reply papers shall be served on or before January 25, 2021.

PLEASE TAKE FURTHER NOTICE, that Defendant requests oral argument on this motion.

Dated: December 21, 2020
New York, New York

Respectfully submitted,

ZUKERMAN GORE BRANDEIS
& CROSSMAN, LLP


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